

CORRES. CONTROL
INCOMING LTR NO.

04397 RF 94

States Government

Department of Energy

Rocky Flats Flats Office

DUE
DATE

ACTION

DIST.	LTR	ENC
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BURLINGAME, A.H.		
BUSBY, W.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
IANNI, B.J.		
HEALY, T.J.		
HEDAH, T.G.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
KLARX, G.E.		
McDONALD, M.M.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STIGER, S.G.		X
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		

Ray, R.J.	X	X
Schubbe, D.	X	X
Hollowell, L.	X	X

CORRES. CONTROL	X	X
ADMN RECORD/080		
PATS/T130G		

Reviewed for Addressee
Corres. Control RFP

12-2-94 *Gas*
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

memorandum

DEC 02 1994

ER:WNF:12189

Proposed Plan for Operable Unit No. 15

Richard J. Ray
Operable Unit 15 Project Manager
Environmental Restoration Programs Division
EG&G Rocky Flats, Inc.

The purpose of this memorandum is to convey the Department of Energy's comments on the draft Proposed Plan (PP) for Operable Unit No. 15. In general, the PP is well done.

Your organization continues to prepare excellent documents.

Specific comments, largely editorial in nature, are attached.

If you have any questions please contact me at extension 4013.

William N. Felt

William N. Fitch
Manager, Operable Unit No. 15
Environmental Restoration

Attachment

cc w/o Attachment:
J. Roberson, AMER, RFFO
F. Lockhart, ER, RFFO
S. Stiger, EG&G
D. Schubbe, EG&G

Specific Comments on the Draft OU-15 Proposed Plan

pg. 3, col. 2, para. 2, line 3 — Why is "mixed wastes" italicized?

line 4 — I suggest changing "primary RFETS site" to "Rocky Flats Industrial Area"

line 7 — RFETS was not divided into 16 Operable Units: individual hazardous substance sites were defined and these were grouped into 16 operable units; which occupy a small portion of the overall RFETS site, except for ground and surface water OUs. I suggest rewording the sentence "Due to the complex nature of the site, RFETS has been divided into 16 Operable Units. Something like the above thoughts should suffice.

pg. 4, col. 2, para. 3, line 5 — I would delete the parenthetical "(RCRA-regulated)": it is redundant and it is an example of the practice EPA identified as inappropriate in their comments.

para. 4, line 10 — The phrase "non-detectable levels" may confuse some readers: I would reword the sentence--something like "specifying that the hazardous constituents associated with the waste that were managed in the IHSSs not be detected in the samples collected (above detection limits for the analytical technique used)."

pg. 5, cols. 1 & 2, all paras. — I find the repetition in the individual IHSSs discussion to be annoying. Since all IHSSs except the Chip Roaster have identical discussions, how about altering the presentation (starting in the middle of column 1)--

- Delete "The following is a summary"
- Delete the IHSSs titles at the top of the paragraphs.
- Leave the paragraphs beginning with "The results of ... " and "The sampling and analytical results also demonstrate ... " one time and delete the repeats of the same paragraphs.
- Change the IHSS reference within the two paragraphs to make the paragraphs address all IHSSs; i.e., IHSSs 178, 179, 180, 204, 211 and 217.
- Then make paragraphs 2 and 3 of the IHSS 204 discussion fit the new discussions.

These changes should eliminate the repetition.